

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BARBARA BRUNO and JOSEPH BRUNO,

Plaintiffs,

-against-

ZIMMER, INC., et al.,

Defendants.

CV 15-6129 (LDW) (AKT)

DECLARATION OF
DONNA H. CLANCY, ESQ.

Donna H. Clancy, under penalty of perjury and pursuant to 28 U.S.C. § 1746, hereby declares as follows:

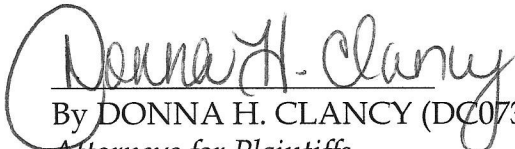
1. I am an attorney for the Plaintiffs and, as such, I am fully familiar with the matters set forth herein. I submit this Declaration and the accompanying Exhibits in further support of Plaintiffs' motion for leave to amend Plaintiffs' Complaint, pursuant to F.R.C.P. 15(a).
2. A copy of Plaintiffs' Proposed Second Amended Complaint, is attached as Exhibit A.
3. A copy of the relevant pages of Dr. Douglas Petraco's deposition transcript dated June 22, 2016 is attached as Exhibit B.
4. A copy of the relevant pages of submission by Zimmer, Inc. to the FDA is provided under seal pursuant to the parties' Confidentiality Agreement marked confidential as Exhibit C.

5. A copy of the relevant pages of Dr. Douglas Petraco's medical record of Plaintiff Barbara Bruno.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 21, 2016

THE CLANCY LAW FIRM, P.C.


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